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Attorneys for Defendant Google LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF JONATHAN TSE IN
SUPPORT OF DEFENDANT GOOGLE
LLC'S ADMINISTRATIVE MOTION TO
SEAL THE COURTROOM FOR MARCH
17, 2022 DISCOVERY HEARING (DKT
NO. 477)**

Referral: Hon. Susan van Keulen, USMJ
Hearing Date: March 17, 2022
Hearing Time: 10:00 A.M.

1 I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney with Quinn
3 Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action.
4 I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a
5 witness, I could and would testify competently thereto.

6 2. I submit this declaration in support of Google’s Administrative Motion to Seal the
7 Courtroom for March 17, 2022 Hearing related to the parties’ March 14, 2022 Joint Submission in
8 Response to Dkt. 447 re: Status of Discovery Disputes (Dkt. 485).

9 3. On March 15, 2022, Plaintiffs confirmed that they expect to reference Google’s
10 Protected Material at the hearing on March 17, 2022. Plaintiffs further informed Google that they
11 do not oppose the instant motion.

12
13 I declare under penalty of perjury of the laws of the United States that the foregoing is true
14 and correct. Executed in San Francisco, California on March 16, 2022.

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16 DATED: March 16, 2022

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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18 By /s/ Jonathan Tse
Jonathan Tse

19 *Attorney for Defendant*
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